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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

LAGARION BROWN, ROY JACKSON,  
YAPHETT SAUNDERS, ISAAC  
SAUNDERS, HAKEEM ALLAMBIE, and  
NICHOLON GARRETT, individually and on  
behalf of those similarly situated,

Plaintiffs,

vs.

TETRA TECH, INC., JESCO  
ENVIRONMENTAL AND GEOTECHNICAL  
SERVICES, INC., and DOES 1-20,

Defendants.

**Case No.: 2:20–CV–01133–DJC–DMC**

**CLASS ACTION**

**PLAINTIFFS’ NOTICE OF MOTION  
AND MOTION FOR PRELIMINARY  
APPROVAL OF AMENDED CLASS  
SETTLEMENT**

Date: March 28, 2024  
Time: 1:30 PM  
Judge: Hon. Daniel J. Calabretta  
Room: 10, 13th Floor

Complaint Filed: June 3, 2020

TO THE HONORABLE COURT AND ALL INTERESTED PARTIES AND  
THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on March 28, 2024 at 1:30 PM, before the Honorable Daniel J. Calabretta of the United States District Court, Eastern District of California, in courtroom 10, 13th floor, at 501 I Street, Sacramento, CA 95814, plaintiffs Lagarion Brown, Roy Jackson, Yaphett Saunders, Isaac Saunders, Hakeem Allambie, and Nichlon Garrett (“Plaintiffs”) will, and hereby do, move for an Order: (1) granting preliminary approval of their amended class settlement; (2) granting conditional certification of the settlement class and FLSA collective; (3) approving and directing distribution of the Class Notice and related materials to the Class; (4) appointing the Class Representatives, Class Counsel, and Settlement Administrator; and (5) setting a final approval schedule.

Plaintiffs bring this Motion on the grounds that, after arms-length negotiations, the parties have reached a fair, reasonable, and adequate settlement that is within the range of final approval. This Motion is based on this Notice and Motion, the supporting Memorandum of Points and Authorities, the Declaration of Stan Mallison, including attached exhibits and the proposed Class Notice, the record on file herein, and any other evidence and oral argument that may be presented at the hearing, and such other matters of which the Court may take judicial notice.

Dated: February 6, 2024

**MALLISON & MARTINEZ**

By: /s/ Stan Mallison  
Stan Mallison  
Hector R. Martinez  
Daniel C. Keller